

Memorandum

To : File

Date : January 19, 1989

From : FAIR POLITICAL PRACTICES COMMISSION
John McLean

Subject: Advice No. T-88-446

In December, I spoke to Gordon Phillips regarding this advice request. I informed him of the following:

1. We are providing advice under the regulation as adopted by the Commission on December 6.
 2. The cost of producing Xmas cards is included in the phrase "sent at public expense" under the mass mailing law.
 3. If each individual councilmember sends out cards with his or her name printed inside, each member may send out 199 cards.
- Mr. Phillips indicated that he did not need written confirmation of this advice.

JGM:ld:jmmemol



FPPC

Nov 23 8 40 AM '88

CITY OF REDONDO BEACH
CALIFORNIA

415 DIAMOND STREET
REDONDO BEACH, CALIFORNIA 90277

November 22, 1988

VIA FAX AND FEDERAL EXPRESS

State of California
Fair Political Practices Commission
P. O. Box 807
Sacramento, California

Re: Proposition 73 Advise

The City of Redondo Beach is contemplating printing Christmas cards for its elected officials. The individual name of each official would appear on each card. The number of cards would depend on the request of each elected official. In some instances more than 200 cards would be printed, in other instances less than 200 cards would be printed.

The cards would then be sent at the expense of the individual office holder.

ISSUES

1. Is the expense of the production of the Christmas cards a Proposition 73 expense under the current regulations?
2. Is the answer to No. 1 the same if each official is limited to 199 cards?

State of California
Fair Political Practices Commission
November 22, 1988
Page 2

3. How is the 200 piece limitation determined, i.e. by the aggregate of cards printed or by the number allocated to each individual elected official?

4. If the printing of the cards is not limited by Proposition 73 under the current regulations, what would be the effect of an intervening regulation prohibiting the mailing of the cards, after the printing of the cards have been printed?

Because of the timeliness of this request, I am requesting your earliest response.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'G. Phillips', with a long horizontal flourish extending to the right.

Gordon C. Phillips

City Attorney

GCP:N



California Fair Political Practices Commission

November 28, 1988

Gordon C. Phillips
City Attorney
415 Diamond Street
Redondo Beach, CA 90277

Re: 88-446

Dear Mr. Phillips:

Your letter requesting advice under the Political Reform Act was received on November 22, 1988 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact John McLean, an attorney in the Legal Division, directly at (916) 322-5901.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or more information is needed, you should expect a response within 21 working days if your request seeks formal written advice. If more information is needed, the person assigned to prepare a response to your request will contact you shortly to advise you as to information needed. If your request is for informal assistance, we will answer it as quickly as we can. (See Commission Regulation 18329 (2 Cal. Code of Regs. Sec. 18329).)

You also should be aware that your letter and our response are public records which may be disclosed to the public upon receipt of a proper request for disclosure.

Very truly yours,

Kathryn E. Donovan
Diane M. Griffiths *for*
General Counsel

DMG:plh

FPPC

Nov 22 3 53 PM '88

CITY OF REDONDO BEACH

FAX NUMBER: (213)-379-9268

SENT TO: FAIR POLITICAL PRACTICES COMMISSION
ATTENTION: LEGAL DEPARTMENT
DOCUMENT TYPE: LETTER REQUEST OPINION
DOCUMENT CONTAINS PAGES 1 through 3
(including this page)
DATE/TIME SENT: 11/22/88 10 AM

SENT BY: Dina Yoshida
DEPARTMENT: City Attorney

City of Redondo Beach
415 Diamond Street
Redondo Beach, CA 90277
(213) ~~379-1111~~

318-0655

FAX - 213-379-9268



CITY OF REDONDO BEACH CALIFORNIA

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